

Exhibit 3

Joint Trial Worksheet & Parties' Witness List

PLAINTIFFS' WITNESSES:

Witness Name:	Zelma Loeb-Defever		
Subject Matter:	Ms. Loeb is a Plaintiff in the case and owner of Plaintiff Loeb Architects, LLC. She will testify the design, development and history of the Woodhaven Village project, the history of Plaintiffs' dealings with Defendants, and others involved with the project. She will also testify regarding the similarities of her copyrighted works and the infringing works at issue in this lawsuit.		
Time for Direct:	90 minutes	Time for Cross:	100 minutes
Witness Name:	Ceasar Corrales		
Subject Matter:	Mr. Corrales is an employee of Trout who will testify regarding the preparation the infringing architectural plans and design at issue.		
Time for Direct:	20 minutes	Time for Cross:	40 minutes
Witness Name:	Angelica Batac		
Subject Matter:	Ms. Batac is a former employee of Trout who will testify regarding the preparation the infringing architectural plans and design at issue.		
Time for Direct:	20 minutes	Time for Cross:	50 minutes
Witness Name:	Robert Partin		
Subject Matter:	Mr. Partin will testify regarding his companies' dealings with Woodhaven Village, their revenue, and the infringements by Defendants.		
Time for Direct:	20 minutes	Time for Cross:	20 minutes
Witness Name:	Matthew Peterson		
Subject Matter:	Mr. Peterson is an architecture and design expert for Plaintiffs. He will testify regarding the matters in his expert report and deposition.		
Time for Direct:	45 minutes	Time for Cross:	50 minutes

Witness Name:	Adversely, the representative(s) at trial of the Padua Defendants, the Operator-Manager Defendants, the Inmobilia Defendants and Cottages at Woodhaven Village		
Subject Matter:	This representative will testify regarding Defendants' gross revenue and the creation, development, distribution and other infringing activity related to Woodhaven Village. The witness may also testify regarding vicarious and contributory liability for copyright infringement.		
Time for Direct:	30 minutes (each)	Time for Cross:	50 minutes (each)

Witness Name:	Adversely, the representative(s) at trial of the Propero Defendants, the CPF Defendants, and Grace Management Co.		
Subject Matter:	This representative will testify regarding Defendants' gross revenue and the creation, development, distribution and other infringing activity related to Woodhaven Village. The witness may also testify regarding vicarious and contributory liability for copyright infringement.		
Time for Direct:	30 minutes (each)	Time for Cross:	40 minutes (each)

Witness Name:	Larry Steinberg		
Subject Matter:	Mr. Steinberg is an accounting expert for Plaintiffs. He will testify regarding the matters in his expert report and deposition.		
Time for Direct:	60 minutes	Time for Cross:	45 minutes

DEFENDANTS' WITNESSES:**Witness Name:**

Antonio "Tony" Padua

Subject Matter:

Primarily the manager of Padua Realty. Will testify the design, development and history of the Woodhaven Village project, the history of dealings involving Loeb, Trout, Paradigm, the other Defendants, and others involved with the project; the timing and nature of the involvement by the Padua Defendants, Operator-Manager Defendants, Inmobilia Defendants and Woodhaven Cottages in the Woodhaven Village project; factors other than copying that account for features in the Trout plans; the lack of direct, vicarious or contributory infringement or DMCA violations by the Defendants; the lack of knowledge, direct profit, control, intent or other scienter; the lack of breach by Padua Realty; breaches by Loeb, damages to Padua Realty; the number of uploads; the Defendants' defenses including statute of limitations (i.e., framing, sheathing and roofs being finished by July 30, 2016), express license, implied license, and prior breach; profits attributable to alleged infringement, deductible expenses, and how any claimed profits are not attributable to any alleged copyright infringement.

Time for Direct:

40 minutes

Time for Cross:

30 minutes

Witness Name:

Alejandro "Alex" Padua

Subject Matter:

Primarily the general counsel of Padua Realty. Will testify regarding the development and history of the Woodhaven Village project, the history of dealings for the project, the timing and nature of the involvement by the Padua Defendants, Operator-Manager Defendants, Inmobilia Defendants and Woodhaven Cottages in the Woodhaven project; the lack of direct, vicarious or contributory infringement or DMCA violations by the Defendants; the lack of knowledge, direct profit, control, intent or other scienter; and the Defendants' defenses including, on the issue of limitations, Mr. Padua being at the topping out party.

Time for Direct:

30 minutes

Time for Cross:

15 minutes

Witness Name:	Francisco Padua		
Subject Matter:	Primarily the developer of Woodhaven Forest. Will testify regarding the development and history of Woodhaven Forest and the Woodhaven Village project; the history of dealings with Paradigm, the other Defendants and others involved with the project; the timing and nature of the involvement by the Padua Defendants, Operator-Manager Defendants, Inmobilia Defendants and Woodhaven Cottages in the Woodhaven project; the lack of direct, vicarious or contributory infringement or DMCA violations by the Defendants; and the lack of knowledge, direct profit, control, intent or other scienter.		
Time for Direct:	30 minutes	Time for Cross:	15 minutes

Witness Name:	Angelica Batac (if not called in Plaintiffs' case)		
Subject Matter:	Designer (now registered architect) formerly with Trout who will testify regarding her preparation of architectural plans, factors other than copying that account for features in the Trout pans, and how neither she nor Trout copied or relied upon Loeb's drawings, or otherwise committed or were involved in any copyright or DMCA violations.		
Time for Direct:	60 minutes	Time for Cross:	20 minutes

Witness Name:	John Pollock		
Subject Matter:	Mr. Pollock was an owner for the Park Meadows project in LaMarque, and has knowledge of the poor quality of the work performed by Loeb, including the situation regarding her schematics for LaMarque being drawn as substantially encroaching on different property.		
Time for Direct:	20 minutes	Time for Cross:	05 minutes

Witness Name:	Bryce Cook		
Subject Matter:	Mr. Cook is the damages expert for the Padua Defendants, Operator-Manager Defendants, Inmobilia Defendants and Woodhaven Cottages. He will testify regarding the matters in his expert report.		
Time for Direct:	40 minutes	Time for Cross:	20 minutes

Witness Name:	Cesar Corrales (if not called in Plaintiffs' case)		
Subject Matter:	Mr. Corrales is with Trout. He will testify regarding Trout's work in the case, factors other than copying that account for features in the Trout plans, and how neither Ms. Batac nor Trout copied or relied upon Loeb's drawings, or otherwise committed or were involved in any copyright or DMCA violations.		
Time for Direct:	40 minutes	Time for Cross:	20 minutes

Witness Name:	Lee Cory		
Subject Matter:	A Principal at Paradigm Senior Living, an expert in senior living design, development and operation, and a non-retained expert for the Defendants. Mr. Cory will testify regarding his involvement in, and knowledge of the design, development and operation Woodhaven Village project and the Ella Springs project, regarding notice to Plaintiffs regarding Woodhaven Village prior to July 30, 2016 pertinent to limitations, and regarding the matters disclosed in his expert designation, including ones that pertain to the senior living industry, factors for success in the industry, scenes a faire for senior living projects, lack of infringement, lack of profits attributable to alleged infringement, and apportionment.		
Time for Direct:	60 minutes	Time for Cross:	30 minutes

Witness Name:	Jay Flatt		
Subject Matter:	Principal with CPF Defendants who will testify regarding the timing and nature of the involvement by the CPF Defendants in the Woodhaven project and how the CPF Defendants did not have any knowledge of, or intent regarding, the Loeb Drawings and did not commit any act of infringement or DMCA violation. He will also testify regarding deductible expenses, and how any profits of the CPF Defendants are not attributable to any alleged copyright infringement.		
Time for Direct:	40 minutes	Time for Cross:	20 minutes

Witness Name:	Larry Chiagouris		
Subject Matter:	Dr. Chiagouris is the marketing and survey expert for the Defendants. He will testify regarding the matters in his expert report.		
Time for Direct:	40 minutes	Time for Cross:	30 minutes

Witness Name:	Karl Drucks		
Subject Matter:	A director at Paradigm Senior Living. Will testify about the design, planning, and operation of Woodhaven Village from his knowledge as an employee of Paradigm Senior Living. Mr. Drucks is also expected to testify regarding limitations, including notice to Loeb of the matters concerning Woodhaven Village now alleged to be infringing prior to July 30, 2016.		
Time for Direct:	20 minutes	Time for Cross:	15 minutes

Witness Name:	James (Patrick) Hackett		
Subject Matter:	Principal with the Propero Defendants who will testify regarding the timing and nature of the involvement of the Propero Defendants in the Woodhaven Project, and how the Propero Defendants had no knowledge of the Loeb Drawings. He will also testify regarding deductible expenses, and how any profits of the Propero Defendants are not attributable to any alleged copyright infringement, and did not commit any act of infringement.		
Time for Direct:	40 minutes	Time for Cross:	20 minutes

Witness Name:	Robert Greenstreet		
Subject Matter:	Dr. Greenstreet is the architectural expert for the Defendants. He will testify regarding the matters in his expert report.		
Time for Direct:	60 minutes	Time for Cross:	30 minutes

Witness Name:	Robert Partin		
Subject Matter:	Mr. Partin, the president of Strategic Construction, will testify regarding the construction of the Woodhaven Projects, the architectural plans used to do so, his assessment of the Loeb drawings, and regarding the Defendants' statute of limitations defense, including that the framing, sheathing and roofs for the senior living, assisted living and memory care portions of Woodhaven Village were finished prior to July 30, 2016.		
Time for Direct:	40 minutes	Time for Cross:	20 minutes

Witness Name:	Gregory "Rocky" Goins		
Subject Matter:	Mr. Goins is a senior living industry expert for the Defendants. He will testify regarding the matters in his expert report.		
Time for Direct:	60 minutes	Time for Cross:	30 minutes

Witness Name:	Sean Ratteree		
Subject Matter:	Mr. Ratteree was a former Project Manager engaged by Padua Realty Co. at Woodhaven Village. Mr. Ratteree is expected to testify regarding limitations, including that the framing, sheathing and roofs for Woodhaven Village were finished by July 30, 2016.		
Time for Direct:	20 minutes	Time for Cross:	15 minutes

Witness Name:	Matt Beshara		
Subject Matter:	Mr. Beshara is a principal at Strategic Construction. Will testify about matters regarding limitations, including that the framing, sheathing and roofs for Woodhaven Village were finished prior to July 30, 2016.		
Time for Direct:	20 minutes	Time for Cross:	15 minutes

Witness Name:	Beth Hill		
Subject Matter:	Ms. Hill is an expert in interior design for senior living projects and a non-retained expert for the Defendants. She will testify regarding her involvement in, and knowledge of the Woodhaven Village project (and Ella Springs project) and regarding the matters disclosed in her expert designation, including ones that pertain to senior living design, scenes faire for senior living projects, lack of infringement, lack of profits attributable to alleged infringement, and apportionment.		
Time for Direct:	40 minutes	Time for Cross:	30 minutes

Witness Name:	Bernard Adeshina		
Subject Matter:	Mr. Adeshina is a Life Safety Code and construction consultant who has knowledge of the design and construction of Woodhaven Village. He has knowledge of and can testify about code and other requirements for Woodhaven Village that provided constraints on the design. He also has knowledge of the project being framed and roofed prior to July 30, 2016. He was also involved in the Ella Springs project.		
Time for Direct:	20 minutes	Time for Cross:	15 minutes

Witness Name:	John Bone		
Subject Matter:	Mr. Bone is the damages expert for the Propero Defendants and the CPF Defendants. He will testify regarding the matters in his expert report.		
Time for Direct:	45 minutes	Time for Cross:	30 minutes

PLAINTIFF'S REBUTTAL

Witness Name:	Betsy Gelb, Ph.D.		
Subject Matter:	Dr. Gelb will testify as a rebuttal expert should Defendants call Larry Chiagouris or any other witness offering testimony similar to those disclosed by Defendants above regarding Mr. Chiagouris. Dr. Gelb has been identified as an expert in this case and will testify to matters in her expert report and deposition.		
Time for Direct:	30 minutes	Time for Cross:	20 minutes

CLOSING:

Minutes Requested by Plaintiffs: 60 minutes

Minutes Requested by Defendants: 20 minutes collectively for the CPF Defendants and the Propero Defendants. 40 minutes for the Padua Defendants.

Provide any additional informational information that may impact the amount of time needed for trial of this case:

The parties have stipulated that should a witness identified above become unavailable, they will work together to establish a schedule to designate deposition testimony of that witness.

The parties have also stipulated that attorney's fee claims, including contractual fee claims, shall be handled post-verdict by the Trial Judge, as if they were statutory fee claims.

Total Number of Hours and Minutes Estimated for Trial:

by Plaintiffs: 770 minutes for testimony

by Defendants: 970 minutes for testimony

Date Filed: July 9, 2021

/s/ _____

/s/ /s/ John J. Edmonds

COUNSEL FOR PADUA DEFENDANTS,
OPERATOR-MANAGER DEFENDANTS,
IMMOBILIA DEFENDANTS AND
COTTAGES AT WOODHAVEN VILLAGE,
LTD.

/s/ Robert P. Latham

COUNSEL FOR CPF DEFENDANTS AND
PROPERO DEFENDANTS